Virgin Media O2

A roadmap to creating a growing, sustainable, better-connected Britain

September 2026

Introduction

Digital connectivity is fundamental to life in Britain today. On the move, in the office or at home, our broadband and mobile networks allow people to work, to learn, access essential services, be closer to relatives and friends, stay informed and access a world of entertainment. Connectivity is a vital service upon which much of modern life is built.

From phone calls to text messages to high speed internet, telecoms networks have shaped the fabric of 21st century life. Every sector of the economy and every region in the UK relies upon these networks.

The UK is competing in a global race and the telecoms sector is a strategic national asset that must be supported to unleash our potential. As a keystone industry upon which 21st century life depends, telecoms services, and the benefits they unlock, should be made accessible to all.

Fortunately, historically low prices and widespread consumer choice have made internet access widely available and affordable. Usage has grown exponentially, supporting both consumers and online service providers despite the challenge posed by a global pandemic, geopolitical tensions, and supply chain volatility. Today, following major consolidation and renewed investment, coverage targets are being met and consumers benefit from some of the lowest prices in G7 economies for their services.

This has been achieved by incentivising investment, innovation and competition – all of which are vital to unlocking sustained and good growth.

Investment has flowed into the sector, and competition is flourishing, and consumers have reaped the benefits. In many ways, it is a case study for a healthy marketplace.

Fundamental to this success has been the principle that investors can make a fair bet on their investment in our digital infrastructure. However, sustainable infrastructure competition at scale has yet to be established in the fixed market, and billions of pounds will be required in the mobile market in the coming years to roll out next-generation technology.

But telecoms providers are increasingly constrained and facing growing pressure to monetise the next-generation technology they're building. In a globalised world, capital can be deployed anywhere with ease, so we must ensure investors continue to recognise the UK as a strong bet.

As we consider how the UK economy and telecoms need to respond to this challenge and evolve in an AI age, public policy must be informed by industry expertise. Whether it's how we continue the nascent full-fibre rollout to establish scaled competition, close the digital divide or even give consumers a fairer deal when doing everything from buying gig tickets to fighting fraud, we want to use our insights for the collective good.

This document sets out four key public policy areas in which we're working to drive positive change. All are areas where we've deep experience and believe that with a supportive policy environment, the legislative and regulatory framework can unlock growth, inclusion, fairness and innovation across the UK.

01 Incentivising investment

02 Stable and principle-led regulation

03 Protecting consumers in a connected world

04 Maximising social and environmental impact

01

Incentivising investment

Creating the right environment to support and accelerate the deployment of next-generation digital infrastructure

£5m

Daily investment into our networks

9m

Fibre premises and growing

At Virgin Media O2, we invest around £5 million every day in our networks. Through our Mobile Transformation Plan we are providing a step change in coverage nationwide, and our fixed network upgrade and fibre roll out on behalf of nexfibre will see our full-fibre broadband footprint expand to millions more premises.

From 5G to full fibre, we're upgrading the UK to connect more people, more quickly, and more reliably and supporting the government in reaching its connectivity targets.

But too often there are challenges and roadblocks. Planning delays, costly regulation and different rules across the four nations holds us back, stopping us from being able to pursue priority mast sites and upgrades in the areas – often rural communities - that need them most.

Meanwhile, as we make the move away from legacy networks and systems – like 2G, 3G and Public Switch Telephone Network (PSTN) - to more secure and modern equivalents able to meet current and future consumer demand, we face resistance from industries and companies unwilling to engage. With manufacturers no longer producing spare parts for these networks making them increasingly difficult to maintain, keeping them running long term is not an option. Government backing is vital to ensure the success of the technology upgrade programmes that will power Britain in future.

The legal and regulatory environment must incentivise investment and reduce barriers to digital infrastructure deployment and evolution.

01

Incentivising investment

Our recommendations

Cutting the red tape delaying build

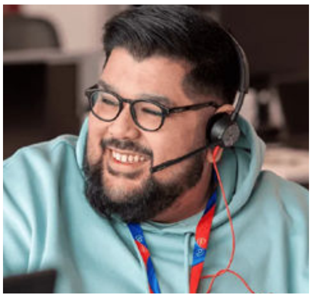
- Urgently reform planning rules to allow 5G infrastructure to fall into Permitted Development Rights, increasing predictability, reducing unnecessary delay and ensuring investment is not tied up in red tape

- Further reforms are needed to reduce restrictions on rooftop masts

- Grant fibre builders additional flexibility to deploy new infrastructure, including reforming access rights to Multiple Dwelling Units via leasehold legislation

- Provide increased funding for local authorities to ensure that essential infrastructure delivery functions such as planning, streetworks and access to public sector assets are fit for purpose and require every council to appoint a Digital Champion to help coordinate and accelerate the rollout of digital infrastructure at a local level

- Ensure that the Building Safety Regulator's guidance for telecoms infrastructure in high risk buildings is proportionate.



Support operators to make essential technology upgrades

- Ensure telecare providers and local authorities engage with the PSTN switchover, and similar programmes, encouraging them to establish data sharing agreements with the telecoms sector to help identify telecare users and provide support to unengaged vulnerable customers

- Encourage councils to meet their duty of care obligations by proactively providing advice, support, and information to residents ahead of switchovers

- Require telecare operators to check that their devices are compatible with digital landline systems / 4G and 5G mobile networks and support customers by informing them and providing new devices in instances where they do not

01

Incentivising investment

Our recommendations

Establish a pro-investment policy environment for telecoms as a foundational sector that drives growth across all parts of the economy

- Reinforce Government's commitment to incentivising and encouraging private investment in mobile through long-term commitments and policy interventions outlined in the Mobile Markets Review
- Government and regulators should allow the fixed line market to evolve and should not frustrate consolidation efforts that are beneficial to the market and consumers. Commercial solutions in cases of supplier failure should always be the preference to formal intervention
- Ensure security policy is appropriate and proportionate, avoiding placing unwarranted cost and complexity onto telecoms operators. As part of this, Government must ensure the updated Telecoms Security Code of Practice reflects its intended role as guidance, not prescriptive regulation, including by removing language that creates a mandatory interpretation, confirming Ofcom's role as enforcing the Security Measures Regulations and promoting flexibility in compliance.
- Establish parity across the UK's security and resilience policy to ensure all sectors are regulated to a high and aligned standard. As part of this, we must use the Cyber Security and Resilience Bill to close the legislative gap that leaves the telecoms sector's critical suppliers unregulated

Reform the business rates regime to ensure infrastructure investment is supported not penalised

- Revisit the super multiplier proposals to avoid disproportionately hitting critical infrastructure investors with large increases in their rates bill
- Reintroduce a targeted "Fibre Rate Relief" scheme to accelerate and maximise investment in fibre broadband
- Abandon or amend "Duty to Notify" rules which will place a large administrative reporting burden on businesses and add limited public value
- Commit to reforming the Valuation Office Agency (VOA) to ensure greater transparency, consistency and more robust and evidence-based decision making that aligns with the need to encourage and support investment by businesses
- Introduce an independent appeals process to improve fairness and reduce the backlog of disputes

02

Stable and principle-led regulation

Boosting competitiveness by supporting innovation and growth across the UK's digital economy

Long term growth in the UK economy requires long term investment.

Having access to high speed and resilient connectivity is a strategic national asset, essential for the UK to be a global leader in new and emerging technologies including AI.

Telecoms networks will serve as the invisible backbone making AI development and adoption possible. We're committed to working with government and regulators to build a future-proof digital Britain – where business ambition and innovation isn't held back, but unleashed by our infrastructure.

But decisions around our future investment rely on clear, proportionate rules and confidence that the goalposts won't shift unexpectedly. Rules which incentivise investment into the sector, rather than restricting supply of finite spectrum and imposing significant costs on operators.

Without this confidence and a pro-growth landscape, we risk diverting capital away from nationally important networks and taking investment out of the sector.

02

Stable and principle-led regulation

Our recommendations

Create a predictable, innovative and pro-investment regulatory environment

- Ensure pro-growth Statement of Strategic Priorities is borne out in Ofcom's work, and require growth to be evaluated as part of its impact analysis in regulatory decision making
- Unlock Innovation through deregulation of outdated net neutrality rules to allow operators to deliver better, more bespoke services to consumers and businesses. A permissive approach to areas such as network slicing, fixed broadband differentiation and 5G standalone monetisation, could drive innovation and sustainable growth
- Carry out a detailed review of net neutrality legislation to explore how differentiated services, particularly in areas such as network slicing, fixed broadband differentiation and 5G standalone monetisation, could drive innovation and sustainable growth
- Government and Ofcom continue to engage with industry on the future of TV distribution to ensure that future arrangements are sustainable and equitable for all stakeholders and maximum value for the UK is realised

Strategic spectrum management

- Reduce unnecessary Annual Licence Fees to allow mobile network operators to redirect spend towards further network improvement
- Publish a clear roadmap for future spectrum availability and licensing conditions to plan long-term investment
- Make additional mid-band (3.8-4.2GHz) spectrum available to mobile industry, recognising the economic and social value the sector delivers and minimal deployment seen to date in this range

03

Protecting consumers in a connected world

Helping consumers to benefit from the online world safely and fairly

1.4bn

Scam texts blocked from customers since 2023

80m

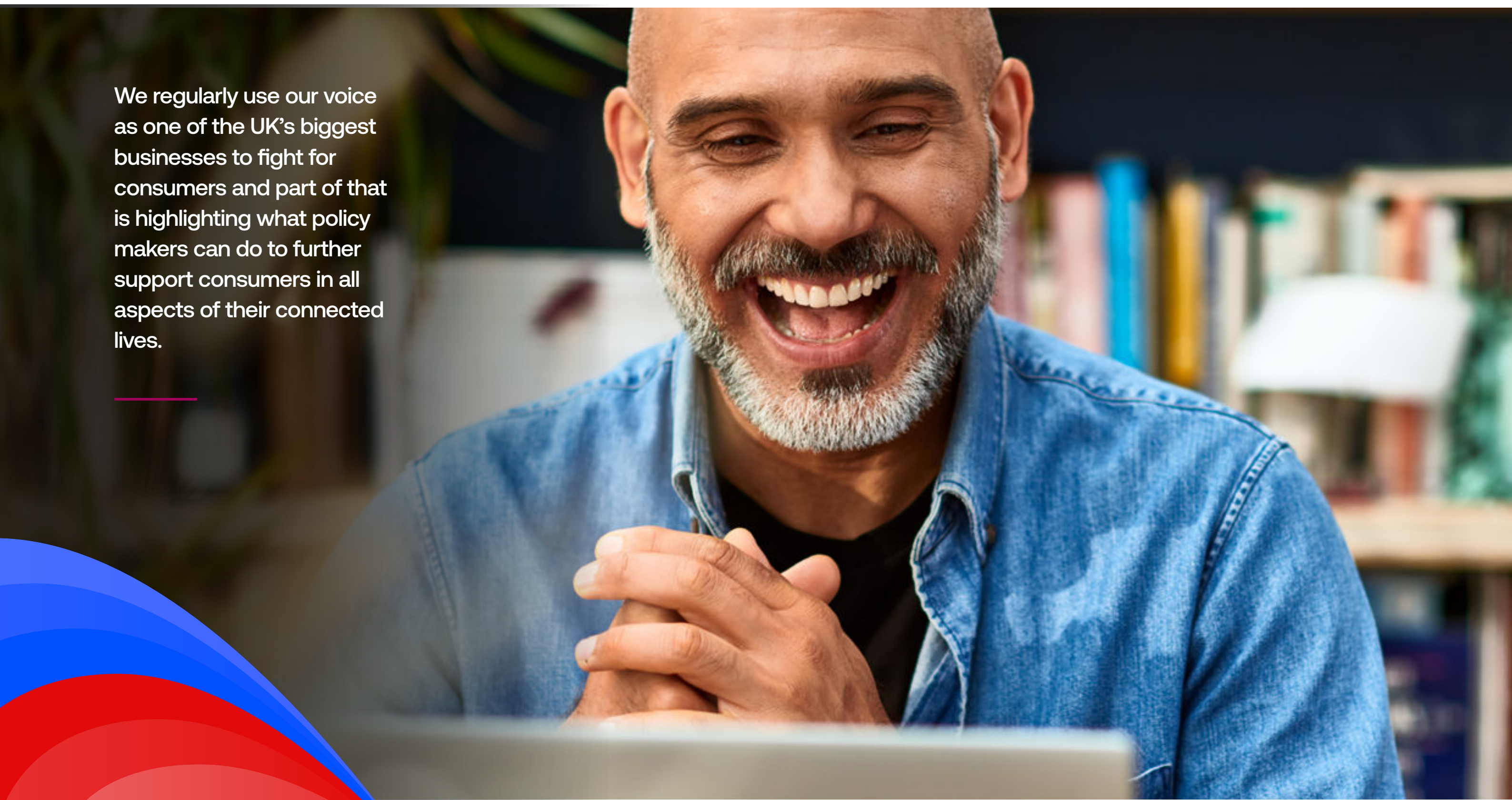
Suspicious calls per month flagged before customers even pick up the phone

Access to connectivity is vital for consumers to benefit from the digital revolution.

Right across the telecoms sector measures already in place mean it's easier than ever to get online. From the national databank to social tariffs and device donation schemes; pro-consumer regulation ensuring contracts are clear; and continued help for vulnerable customers with essential technology migrations, customer-focused initiatives have transformed access to connectivity.

Given our direct relationship with millions of customers, we hear what matters to them and have a long history of standing up on key consumer issues. From ticketing touts ripping music fans off by inflating the price of gig tickets, to fraudsters targeting people day in day out and causing victims financial and emotional harm that could last a lifetime, we're working tirelessly to help tackle some of the issues they face in the digital world.

We've blocked more than 1.4 billion scam texts from reaching customers since 2023 and are flagging more than 80 million suspicious calls a month before someone even picks up the phone. In just a six-week period, we blocked more than 50,000 suspected bots from entering our Priority Tickets platform.



We regularly use our voice as one of the UK's biggest businesses to fight for consumers and part of that is highlighting what policy makers can do to further support consumers in all aspects of their connected lives.

03

Protecting consumers in a connected world

Our recommendations

Protect consumers without curtailing investment

- Ensure regulators approach the application of existing consumer regulations in a way that proportionate and does not undermine the growth and investment agenda
- Make tackling fraud a national priority by establishing the National Police Service – a centralised and specialised body with a real focus on fraud. In addition, deliver on an action-oriented framework for data sharing through the Online Crime Centre
- Introduce legislation without delay to ensure live event tickets cannot be resold for profit, to combat the £400,000 that touts are costing consumers per day

Empower everyone to participate and benefit from digital services

- Establish a national strategy to boost media and digital literacy, including how Government will properly resource and support educators to implement media literacy within the National Curriculum
- Embed existing digital inclusion initiatives including social tariffs and the national databank across government consumer touchpoints such as Jobcentres and hospitals
- Cut VAT on social tariffs – discounted cheaper broadband and phone packages for people claiming certain benefits – from 20% to no more than 5%, in line with other essential items

04

Maximising social and environmental impact

Creating opportunities for connectivity to deliver better outcomes for communities and the planet

Technology is constantly showing us that we're better when connected. It brings us together when we're apart, helps us tackle issues rooted deep within society and puts us on a path to a cleaner, more sustainable way of living.

This vision led us to our Responsible Business Plan plan – Virgin Media O2's environment, social and governance (ESG) strategy – which is a commitment to making sure our business operates in a sustainable and ethical way.

However, delivering meaningful impact at scale requires more than corporate ambition. We also need government action to help ensure our digital future works for everyone, where people are supported to not only get online but navigate it safely, and policy supports businesses on their green transition.

04

Maximising social and environmental impact

Our recommendations

Faster Grid Decarbonisation

- Deliver the UK's Clean Power 2030 Action Plan - Delivering a 'Green Grid' offering access to the clean energy needed for sectoral transitions plans
- Streamline grid connections for mobile infrastructure, reducing the need for long term fuel generators and improving network resilience

Government to deliver its promised Circular Economy Strategy

- Actively promote the Government's IT Reuse For Good Charter to encourage greater adoption of device reuse schemes, helping to reduce waste, lower emissions and tackle digital exclusion
- Increase the adoption of second-life technology through incentives for businesses
- Introduce a government backed standard for refurbished equipment to build public trust to create clear quality and assurance benchmarks, helping to build trust in refurbished products and stimulate market growth
- Create a national information campaign to increase trust and awareness in the institutions involved in tech re-use sector

04

Maximising social and environmental impact

Our recommendations

Standardise disclosures

- For government to implement UK ESG reporting frameworks that are proportionate and aligned with global standards to remove complexity and duplication while delivering useful information to financial markets

Support a thriving workforce

- Recognise apprenticeships as a cross-generational reskilling route open to all (not just young people) and covering the highest levels of training, including level 6/7 pathways

- Enable employers to offer apprenticeships and learning and development pathways that are flexible in timing, delivery and structure to meet the diverse needs of all potential applicants

- Extend mandatory pay gap reporting to ethnicity and disability characteristics, helping to create a more equitable workforce

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